



Modern Slavery Statement

2025-2026



west midlands
police and crime
commissioner



West Midlands
POLICE

Foreword

This voluntary statement, made in accordance with Section 54(1) of the Modern Slavery Act 2015, outlines the commitment and intended actions of West Midlands Police (WMP) and the West Midlands Police and Crime Commissioner (PCC) to address modern slavery within our business activities and supply chains. We recognise our legal and ethical duty to be vigilant about the potential for modern slavery and our responsibility to identify and report any instances to the appropriate authorities. Tackling modern slavery is a significant challenge that demands sustained effort, and we have been making strides towards understanding this threat within our organization.

Over the next 12 months, we will continue to assess where the risks are highest across our business, identify areas where we have the greatest leverage, and prioritize our actions accordingly. Over the past year, we have enhanced the capabilities of our procurement and commissioning teams to prevent modern slavery.

We are committed to working collaboratively with our suppliers to support and challenge their responses to modern slavery. We will ensure our progress remains transparent, reporting on our successes and identifying areas for improvement. We fully endorse the commitments outlined in this statement and will closely monitor our progress.



Simon Foster
West Midlands Police
& Crime Commissioner



Chief Constable
Craig Guildford QPM VR DL
West Midlands Police

Legal requirement to publish; Published voluntarily

The Modern Slavery Act 2015 implemented new measures which are directly related to businesses and their supply chains. Section 54 of the Act requires companies with an annual turnover above £36m, and carrying out a business, or part of a business, in the UK, to develop a Modern Slavery Statement, also known as a 'Transparency in Supply Chains (TISC) statement', each year. Whilst it is not a legal requirement for public sector organisations to publish modern slavery statements, government and all public sector bodies have the opportunity to use their extensive buying power to help mitigate the risks of slavery occurring within their supply chains by adopting new processes and procedures, in both procurement and supplier management.

On 26 March 2020, the UK became the first country to publish a **government modern slavery statement** setting out the steps the UK government was taking to identify and prevent modern slavery in its own supply chains. This statement covers ministerial departments, HMRC, non-ministerial public bodies and executive agencies where spend is reported centrally. It does not cover devolved authorities in Wales, Scotland and Northern Ireland.

Introduction

The Modern Slavery Act 2015 has revolutionised the UK's response to the exploitation and abuse of countless victims. As the first legislation of its kind worldwide, it has led to more victims being identified and supported, more offenders being prosecuted, and thousands of companies committing to tackling modern slavery within their supply chains. Within the UK, Procurement Regulations have been amended to make certain modern slavery offences grounds for the mandatory exclusion of bidders from public procurements under the Act.

As a force, we acknowledge our responsibility to adopt a robust approach to tackling modern slavery and human trafficking. This includes not only our policing efforts but also our roles as employers and service procurers. This voluntary statement, made pursuant to Section 54 of the Modern Slavery Act 2015, constitutes our Modern Slavery & Human Trafficking Statement for the year ending 31st March 2026. The statement has been reviewed by the Office of the Police and Crime Commissioner (PCC) and the Force Executive Team and will be reviewed annually. This statement reflects the PCC and WMP's commitment to ensuring transparency in our supply chains, responsible procurement of new suppliers, and the steps being taken to prevent modern slavery in our business operations.

As public bodies, the PCC and WMP will work collaboratively with our suppliers to ensure that there is no modern slavery or human trafficking within our supply chain. We will encourage our suppliers to uphold high ethical standards and practices, including fair and appropriate working conditions across the supply chain. The **Joint Procurement Strategy** which outlines our vision, priorities, guiding principles, commercial and procurement structure, and delivery elements, has been reviewed and updated to reflect our commitment to identifying risks in supply chains. This strategy details the steps we are taking to ensure that our supply chain is free from modern slavery.



In line with the updated **Tackling Modern Slavery in Government Supply Chains - Guidance** activity of WMP and the PCC will fall into the following key areas of activity;

- 1.** **Identifying and managing risks in new procurements** - the Modern Slavery Act 2015 forms part of the Procurement Terms and Conditions which is a mandatory requirement. Compliance to the Modern Slavery Act 2015 is also requested as part of the Diversity Tender Questionnaire. An annual check is undertaken to ensure there have not been any changes that we need to be made aware of, this forms part of an annual procurement compliance Survey.
- 2.** **A Joint WMP and OPCC Social Value Policy has been** drafted (almost approved) for 2025-2027.
- 3.** **The Procurement Act 2023** (which went live in February 2025) aims to create a simpler and more transparent regime for public sector procurement that will deliver better value for money, and reduce costs for business and the public sector. The objective is to deliver greater value for money and improved social value, which will help raise standards, drive economic growth and open up public procurement to new entrants such as small businesses and social enterprises.
- 4.** **Social Value** - WMP and OPCC apply a 10% evaluation weighting for Social Value for contracts exceeding £100,000, or where there is an opportunity to develop, consider and drive Social value. We request a social value submission from the supplier via the Social Value Portal which forms 10% of the evaluation where applicable. We have incorporated the following theme for the supplier to elect if they choose to; Economy: Eradicating unethical work in the supply chain. This measure covers support for a range of engagement initiatives that help to identify, monitor and reduce the risks of modern slavery and other unethical work practices within the supply chain. Examples of measure include; are supply chain mapping, robust right-to-work, identity and home address checks, and any workshops or programmes that offer education, training or support to resolve challenges to operating ethically. Recorded hours of staff time can only include time spent preparing and conducting the activities.
- 5.** **Assess existing contracts** - we have committed to carry out a high-level mapping exercise to identify the level either low, medium or high of modern slavery risk within the supply chain for our most strategic contracts over the last 12 months and will continue to do so.
- 6.** **Acting when victims of modern slavery are identified** - this would need to be reviewed and discussed on a case by case basis, ultimately this would be deemed as a breach of contract.
- 7.** **Training** - the procurement team complete CIPS Ethics training which includes a modern slavery module on an annual basis. The procurement team have also completed a Bluelight Commercial Modern Slavery training session.

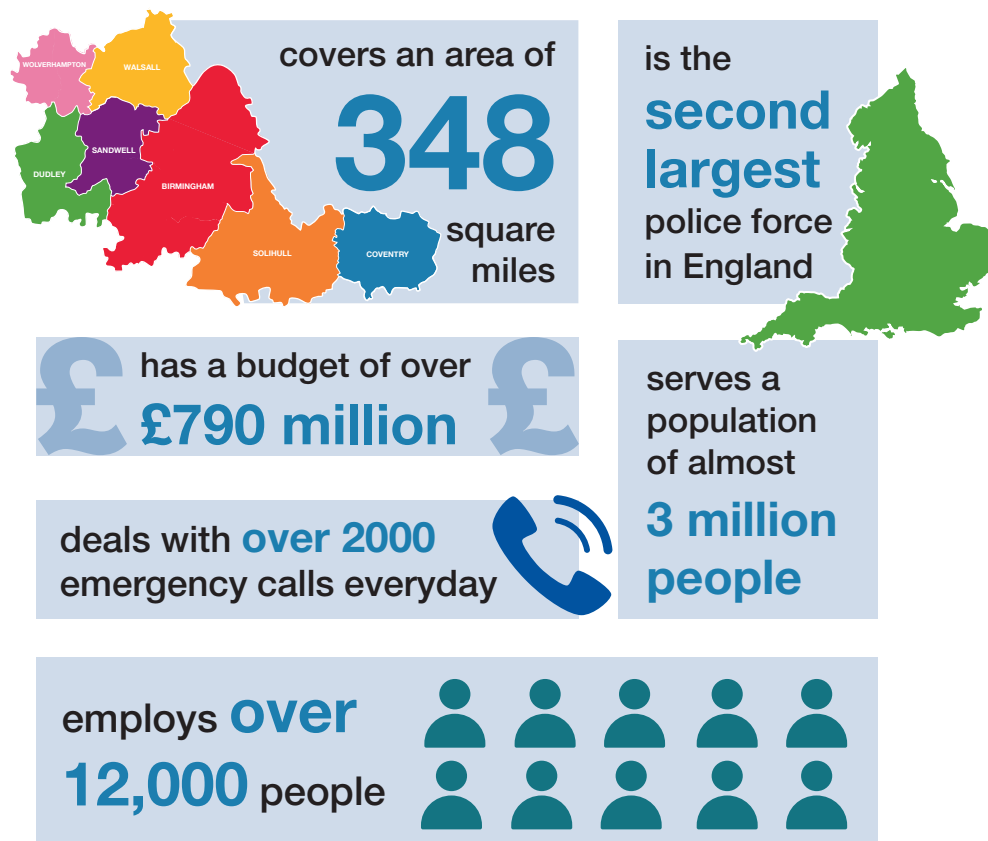
What is modern slavery

Modern Slavery and Human Trafficking are heinous crimes that result in the cruel exploitation of both adults and children for financial gain. Though often hidden in plain sight, modern slavery is prevalent all around us. The impact of the Covid-19 pandemic and the ongoing impact of the cost of living crisis has been profound, and we have witnessed how rapidly the threat of modern slavery has evolved as ruthless criminals seek new opportunities to exploit those who have become vulnerable due to shifts in demand across the labour market.

Organisational structure

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West Midlands Police:



Our business and our supply chains

In its operations, the force procures a wide range of goods and services with an annual expenditure of approximately £80 million. This covers areas such as operational uniform and equipment, IT and technology, professional services, and more. Given the significant sums of public money involved, it is our responsibility to ensure that this expenditure is made in the most cost-effective and efficient manner possible. WMP is committed to ensuring that our wider supply chain is aware of and complies with the high ethical standards we uphold and demand. Operating solely within the UK, WMP considers its activities to be at low risk in terms of modern slavery or human trafficking.

Supporting SMEs and VCSEs

Modern slavery risks can be found in contracts and suppliers of all sizes. We are aware the risk of modern slavery in a contract is not linked to its value, even when a contract is below threshold/low value, the modern slavery risk can be high. We therefore ask questions about modern slavery risks through our grant/contract commissioning processes ensuring they are relevant and proportionate.

The government is committed to working closely with organisations who uphold the strong social values that are vital to the country's well-being and economy. This remains a priority and we are doing more than ever before to make public contracts more accessible to encourage SMEs and VCSEs and ensure supplier diversity in supply chains.

Risk assessment and due diligence

It is important to understand the risk within our supply chains and we understand that embedding modern slavery considerations within our procurement systems and processes is critical when taking a long-term perspective on the problem. Large procurement exercises are carried out by the WMP Procurement Team. When seeking new contractors, we are committed to ensuring the suppliers with whom we do business understand the risks of modern slavery. Our procurement documentation, namely the Terms and Conditions schedule, which is issued as part of WMP tender documentation, seeks confirmation of compliance with the Modern Slavery Act 2015. Furthermore, it seeks assurance that due diligence procedures are in place for sub-contractors and suppliers of the contractor.

WMP is subject to the Procurement Act 2023 which came into force 24th Feb 2025. We are governed by directives to ensure that the principles of non-discrimination and transparency are upheld with the aim of fostering a common internal market. In order to cultivate an internal market, all public procurement policies must comply with these principles. To meet these regulations and transparency requirements we ensure our procurement opportunities and contract awards above certain thresholds are published on Contracts Finder and Find A Tender service. WMP also procure via various national framework agreements and other collaborative procurement processes. As such, the commitments made in this statement extend to contracts that WMP directly tenders for. We source our supplies, services and works from third party suppliers principally within Great Britain.

We include evaluation criteria relating to the Modern Slavery Act 2015 within our procurement documents and robust clauses within all forms of contracts. WMP uses only specified, reputable employment agencies to source labour and always verifies the practices of new agencies before

accepting workers from that agency. It is important we develop our understanding further of our supply chains including labour providers and recruiters to supply chains and services including sub-contractors, distribution, equipment and services. For each of these categories we will:

- Roll out awareness training for the procurement team- Annual modern slavery training forms part of CIPS Ethics training.
- As part of our review of procurement documentation, include the consideration of modern slavery risks at each stage of the procurement process – We are still reviewing documentation.
- With regards to existing suppliers, we will carry out a high-level risk assessment mapping exercise, this has now been completed. All new contracts are assessed once awarded.
- As part of our contract management processes we undertake annual compliance checks against managing modern slavery risks. This is ongoing throughout the duration of the contract term.

Policies

This section is about our policies to prevent modern slavery in our operations and supply chains. WMP corporate policies are reviewed at least every 3 years and are approved by the Executive Team or the Board. The main corporate policies which include the identification and approach to modern slavery and human trafficking are the; Whistleblowing Policy, Safeguarding Policy, Code of Conduct, Code of Ethics, Grievance Policy and Diversity Policies. WMP policies and procedures demonstrate our commitment to acting ethically and with integrity in all its business relationships. The PCC and WMP are fully committed to addressing unethical and illegal employment practices in our supply chains. WMP and the PCC meet or exceeds all statutory requirements relating to staff employment. Both are committed to dignity at work and to the fair treatment of all staff. All employees are paid to recognise their roles and responsibilities at or in excess of the Real Living Wage. In addition, WMP and the OPCC are Real Living Wage employers and providers.



Training and awareness raising

We understand that as a region we will only be able to tackle modern slavery if there is a universal understanding of modern slavery and workforces across our systems are able to appropriately identify and respond. In collaboration with the West Midlands Violence Reduction Partnership and the regional Modern Slavery Human Trafficking Strategic Board, the Exploitation and Missing strategic Board, the Domestic Abuse Strategic Board and the Sexual Assault and Abuse Strategic Board the OPCC has co-designed the **Competency Training and Development Framework for Tackling Exploitation and Abuse**. This is a good practice guidance framework for individuals, organisations and senior leaders to support their response to tackling exploitation and abuse. This framework can be integrated into organisational and partnership systems and training standards to ensure a consistent approach to knowledge and skills required by the workforce when working in the exploitation and abuse field. The four main aims of the framework are:

- **To highlight and recommend best practice to upskill the workforce when identifying and responding to exploitation and abuse.**
- **To establish tiered levels of training in line with competencies needed when identifying and responding to exploitation and abuse.**
- **For organisations to use as a guide to review their existing training arrangements for their workforce.**
- **For organisations to supplement their policies and procedures for Safer recruitment**

Using the above framework, a range of training packages for police officers including the new intake of student officers is being developed. This will seek to increase levels of understanding of the signs of modern slavery or human trafficking, and understand what action they as individuals can take. The following steps have been taken;

- **A training course covering understanding and identifying modern slavery and human trafficking has been introduced and is completed by officers.**
- **An in-house learning package has been developed to support Learning and Development including an input on the Detectives Academy.**
- **First responder training remains a strategic priority for the Modern Slavery Human Trafficking Strategic board.**
- **Additionally the NPCC team have an NCALT; [E-Learning First Responder Training - NPCC Modern Slavery & Organised Immigration Crime Programme](#) (npcc-msoicu.co.uk)**

Governance

In order to deliver against the commitments made in this statement we will identify modern slavery leads to report on the commitments made in this statement. The West Midlands Exploitation and Abuse Framework will enable effective oversight of these actions. Actions specifically for WMP Procurement will sit primarily in the Contract and Procurement delivery plan overseen by the Assistant Director of Finance. We seek a sector-leading approach to modern slavery, core to our approach is a robust governance structure.

Conclusion

This statement exemplifies our unwavering commitment to ensuring that our approach to the procurement and on-boarding of new critical suppliers is both robust and transparent, and that it employs a thorough, risk-based methodology. We recognise the importance of maintaining the highest standards in our procurement practices to prevent modern slavery and human trafficking within our supply chains.

Overview of Current Commitment:

- **Robust Procurement Processes:** We implement stringent criteria for evaluating potential suppliers, ensuring that they meet our high ethical standards and are committed to eradicating modern slavery and human trafficking.
- **Transparency:** Our procurement process is designed to be transparent, providing clear and open communication with our suppliers. We prioritise honesty and integrity in all our dealings.
- **Risk-Based Approach:** We assess potential suppliers based on various risk factors, including their geographic location, the nature of their industry, and their history of compliance with anti-slavery regulations. This allows us to identify and address areas of high risk proactively.





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